

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NORTHFIELD INSURANCE COMPANY, an Iowa corporation, Plaintiff, v. TYLER LIFT SERVICES, LLC and JOSEPH TUSEK, Defendants.	No: 13-cv-08059 Hon. Samuel Der-Yeghiayan
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AGREED MOTION FOR ENTRY OF JUDGMENT

Plaintiff, Northfield Insurance Company (“Northfield”), by its attorneys SmithAmundsen LLC, and Defendant, Tyler Lift Services, LLC, by its attorneys, Spesia & Ayers, move the Court to enter judgment in Northfield’s favor in accord with the proposed judgment that is attached as Exhibit 1 hereto. In support of said motion, the Parties state that they have settled and resolved their differences and, that pursuant to said settlement, and subject to the Court’s approval, the attached judgment is to be entered in Northfield’s favor.

WHEREFORE, the parties pray that the court enter judgment as aforesaid.

Respectfully submitted,

NORTHFIELD INSURANCE COMPANY
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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

s/ Richard T. Valentino

Richard T. Valentino Bar Number: 6188317

Attorney for Plaintiff Northfield Insurance Company

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